

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

)  
DONALD EDWARDS, ) No: 06 C 3110  
Plaintiff, )  
)  
vs. ) Judge Lefkow  
) Judge Coar, Presided over trial  
OFFICERS ROGOWSKI, NEGRON, )  
SHANKLE, AND THE VILLAGE OF ) Magistrate Judge Brown  
MELROSE PARK, ) Jury Demand  
Defendants. )

**FEE MOTION**

NOW COMES Plaintiff Donald Edwards, by and though his counsels Angela Lockett, Standish E. Willis, Teniece Harris and Brendan Shiller, and moves this court pursuant to 42 U.S.C. § 1988, and Federal Rule of Civil Procedure 54(d)(2)(B) for costs and attorneys' fees, and in support of said motion states as follows:

1. On February 28, 2008, a federal jury sitting in the Northern District of Illinois found for Donald Edwards in his 42 U.S.C. § 1983 claims against Officer Shankle and Lt. Rogowski; specifically the court found that Officer Shankle falsely arrested Donald Edwards in violation of 42 U.S.C. § 1983; and that Lt. Rogowski falsely arrested and used excessive force 42 U.S.C. § 1983. Judgment on the case was entered on March 5, 2008.
2. Under 42 U.S.C. § 1988, the prevailing party in a § 1983 suit may obtain reasonable attorneys' fees and costs as determined by the court. *Gaytan v. Kapus*, 181 F.R.D. 573 (N.D. Ill 1998).
3. In this case, Plaintiffs counsel submits the following as fair compensation of attorney fees and costs:

a. Angela Lockett	Rate: \$225.00 Hours: 205	Total: \$46,125
b. Standish E. Willis	Rate: \$450.00 Hours: 45	Total: \$20,250
c. Brendan Shiller	Rate: \$225.00 Hours 70	Total: \$15,750
d. Teniece Harris	Rate: \$250.00 Hours 10	Total: \$2,500
e. Costs:		Total: \$2,585

4. On direction of court, Counsel shall comply with local rule 54.3.

Respectfully submitted,

The Law Office of Standish E. Willis

By: s//Angela Lockett  
Angela Lockett

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